



THE CITY OF NEW YORK
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Via ECF and Email (ALCarterNYSDChambers@nysd.uscourts.gov)

Honorable Andrew L. Carter
United States District Court
Southern District of New York
40 Foley Square, Room 435
New York, New York 10007

Re: *Dameka Dowdy et al. v. City of New York et al.*
Civil Action No.: 22-cv-06284 (ALC)
Defendants' Request for Extension of Time to Respond to October 17, 2022

Dear Judge Carter:

I am an Assistant Corporation Counsel in the Office of the Honorable Sylvia O. Hinds-Radix, Corporation Counsel of the City of New York, attorney for Defendants City of New York and the New York City Department of Sanitation ("DSNY") in the above-referenced matter. In accordance with Your Honor's Individual Rules of Practice, I write to request that Defendants' time to answer or otherwise respond to the Complaint be extended from August 18, 2022, until October 17, 2022. This is Defendants' first request for an extension of time and Plaintiffs have consented to the extension request. No other dates have currently been set in this litigation.

This putative class action is filed by thirteen non-white men and women employed by DSNY as Sanitation Enforcement Agents ("SEAs") or Associate Sanitation Enforcement Agents ("ASEAs"). Plaintiffs allege that Defendants discriminated against them by compensating them less than Sanitation Police. They bring claims under Title VII of the Civil Rights Act of 1964, the New York State Human Rights Law, New York City Human Rights Laws, the Equal Pay Act, and the New York State Equal Pay Law, alleging their work requires equal skill, effort, and responsibility under analogous working conditions as Sanitation Police but is given lower compensation and less favorable contract benefits. Plaintiffs further allege that SEAs and ASEAs are disproportionately non-white men and therefore the alleged disparities between the two titles have a disparate impact on women and minorities.

The extension is requested to allow sufficient time for Defendants to investigate and adequately respond to the allegations in the Complaint. In addition, the undersigned has multiple conflicting deadlines in the coming weeks, including, *inter alia*, a motion to dismiss in an unrelated federal matter due on August 18, 2022, and discovery in a federal case due on August 15, 2022, and September 5, 2022. Accordingly, Defendants respectfully request a 60-day

extension of time to answer or otherwise respond to the Complaint from August 18, 2022, until October 17, 2022.

I thank the Court for its consideration.

Respectfully submitted,

/s/ Angela M. Wanslow

Angela M. Wanslow
Assistant Corporation Counsel

cc:

Via ECF and Email

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